

UNITED STATES BANKRUPTCY  
COURT DISTRICT OF NEW JERSEY

**FEE APPLICATION COVER SHEET FOR THE PERIOD**  
**AUGUST 12, 2023 THROUGH DECEMBER 31, 2023**

Debtor: LTL Management LLC Applicant: Molo Lamken LLP  
Case No.: 21-30589 (MBK) Client: Official Comm. of Talc  
Chapter: 11 Case Filed: October 14, 2021  
Claimants

**SECTION 1**  
**FEE SUMMARY**

☐ Monthly Fee Application No.    or ☒ Interim Fee Application No. 1 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from August 12, 2023 through December 31, 2023

Total Previous Fee Requested: \$642,789.50  
Total Previous Expenses Requested: \$14,700.26  
Total Fees Allowed To Date: \$604,192.40  
Total Expenses Allowed To Date: \$14,700.26  
Total Amount Paid To Date: \$747,282.24  
Holdback for August 12, 2023-December 31, 2023 Invoices: \$76,289.70  
Outstanding Non-Holdback Fees: \$179,320.00  
Outstanding Disbursements: \$0.00

**Total Outstanding Balance Sought to Be Paid at this Time: \$255,609.70**

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE <sup>1</sup>	FEE
1. Jeffrey A. Lamken	Partner 1991	44.2	\$1,750	\$77,350.00
2. Lucas Walker	Partner 2010	64.1	\$1,100	\$70,510.00
3. Rayiner I. Hashem	Partner 2015	58.3	\$975	\$56,842.50
4. Eugene Sokoloff	Counsel 2013	61.6	\$995	\$61,292.00
5. Nathaniel Rubin	Associate 2019	131.2	\$775	\$101,680.00
6. Jackson Myers	Associate 2020	13.7	\$775	\$10,617.50
7. Anna Starobinets	Paralegal	9.2	\$295	\$2,714.00
8. Adam Collins	Paralegal	1.5	\$295	\$442.50

<sup>1</sup> Rates in this statement reflect the rates disclosed in our retention application.

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE <sup>1</sup>	FEE
TOTALS		383.8		\$381,448.50

Fee Totals: \$381,448.50

Disbursements Totals: \$2,550.78

Total Fee Application: \$383,999.28

**SECTION II SUMMARY  
OF SERVICES**

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>FEE</b>
a) <b>Asset Analysis and Recovery:</b> Identification and review of potential assets including causes of action and non-litigation recoveries.	0.0	\$0.00
b) <b>Asset Disposition</b> Sales, leases, abandonment and related transaction work.	0.0	\$0.00
c) <b>Avoidance Action Litigation</b> Preference and fraudulent transfer litigation.	0.0	\$0.00
d) <b>Business Operations</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0.0	\$0.00
e) <b>Case Administration</b> Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	0.0	\$0.00
f) <b>Claims Administration and Objections</b> Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0.0	\$0.00
g) <b>Employee Benefits/Pensions</b> Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0.0	\$0.00
h) <b>Fee/Employment Applications</b> Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	44.8	\$37,545.00
i) <b>Fee/Employment Objections</b> Review of an objections to the employment and fee applications of others.	0.0	\$0.00
j) <b>Financing</b> Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0.0	\$0.00
k) <b>Litigation</b> Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	339.0	\$343,903.50
l) <b>Meetings of Creditors</b> Preparing for and attending the conference of creditors, the 341(a) meeting and creditors' committee meetings.	0.0	\$0.00
m) <b>Plan and Disclosure Statement</b> Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	0.0	\$0.00
n) <b>Relief from Stay Proceedings</b> Matters relating to termination or continuation of automatic stay under 362.	0.0	\$0.00

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>FEE</b>
o) <b>Accounting/Auditing</b> Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0.0	\$0.00
p) <b>Business Analysis</b> Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0.0	\$0.00
q) <b>Corporate Finance</b> Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0.0	\$0.00
r) <b>Data Analysis</b> Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0.0	\$0.00
s) <b>Litigation Consulting</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0.0	\$0.00
t) <b>Reconstruction Accounting</b> Reconstructing books and records from past transactions and bringing accounting current.	0.0	\$0.00
u) <b>Tax Issues</b> Analysis of tax issues and preparation of state and federal tax returns.	0.0	\$0.00
v) <b>Valuation</b> Appraise or review appraisals of assets.	0.0	\$0.00
w) <b>Travel Time (billed @ 50%)</b>	0.0	\$0.00
x) <b>Committee Governance Matters</b> Analysis regarding committee governance matters, including creation of by-laws and addressing other governance matters.	0.0	\$0.00
y) <b>Investigation and Due Diligence</b> Investigation and analysis of prepetition transactions and activities of the Debtor and related entities and assessment of potential claims and causes of action.	0.0	\$0.00
z) <b>Hearings</b> Preparation for and attendance at hearings.	0.0	\$0.00
aa) <b>Mediation</b> Preparation for and attendance at mediation.	0.0	\$0.00
<b>SERVICE TOTALS:</b>	<b>383.8</b>	<b>\$381,448.50</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
a) <b>Filing Fees</b> Payable to Clerk of Court.	\$0.00
b) <b>Computer Assisted Legal Research</b> Westlaw, Lexis and a description of manner calculated. Westlaw and LEXIS at vendor cost.	\$0.00
c) <b>Pacer Fees</b> Payable to the Pacer Service Center for search and/or print.	\$0.00
d) <b>Fax</b> Include per page fee charged.	\$0.00
e) <b>Case Specific Telephone/Conference Call Charges</b> Exclusive of overhead charges. Court-Solutions	\$0.00
f) <b>In-house Reproduction Services</b> Exclusive of overhead charges.	\$0.00
g) <b>Outside Reproduction Services</b> Including printing & scanning services. This includes trial preparation.	\$2,550.78
h) <b>Other Research</b> Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i) <b>Court Reporting</b> Transcripts.	\$0.00
j) <b>Travel</b> Mileage, tolls, airfare, rail fare, parking.	\$0.00
k) <b>Courier &amp; Express Carriers</b> Overnight and personal delivery.	\$0.00
l) <b>Postage</b>	\$0.00
m) <b>Other (specify) Professional Services BRI LLC</b> In-House Investigative Services.	\$0.00
n) <b>Other (specify) Trial Expenses</b>	\$0.00
o) <b>Other (specify) Professional Services</b>	\$0.00
p) <b>Other (specify) Deposition Services</b> Paszkievich Court Reporting	\$0.00
q) <b>Other (specify) Meals</b>	\$0.00
r) <b>Other (specify) eDiscovery Hosting</b> In-House eDiscovery platform.	\$0.00
<b>DISBURSEMENTS TOTAL:</b>	<b>\$2,550.78</b>

I certify under penalty of perjury that the above is true.

Date: February 14, 2024

/s/ Jeffrey A. Lamken